

## EXHIBIT T

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

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4 IN RE: TERRORIST ATTACKS : 03-MDL-1570  
5 ON SEPTEMBER 11, 2001 : (GBD)(SN)

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10 APRIL 6, 2021

11 THIS TRANSCRIPT CONTAINS  
12 CONFIDENTIAL MATERIAL

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16 Remote Videotaped  
17 Deposition, taken via Zoom, of CHAS W.  
18 FREEMAN, JR., commencing at 9:08 a.m., on  
19 the above date, before Amanda  
20 Maslynsky-Miller, Certified Realtime  
21 Reporter and Notary Public in and for the  
22 Commonwealth of Pennsylvania.

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25 GOLKOW LITIGATION SERVICES  
26 877.370.3377 ph| 917.591.5672 fax  
27 deps@golkow.com

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1 immunity.

2 Q. In preparation for your  
3 testimony for this deposition, did you  
4 review any documents to refresh your  
5 memory?

6 MR. GOETZ: Objection.  
7 Form.

8 MR. HAEFELE: You may  
9 answer.

10 THE WITNESS: Well, I  
11 reviewed the documents provided by  
12 plaintiffs' counsel. I reread the  
13 9/11 report, which I had been  
14 interviewed for but had not read  
15 in its entirety previously.

16 I read -- I read the  
17 documents that plaintiffs  
18 submitted, intelligence documents,  
19 diplomatic documents.

20 BY MR. HAEFELE:

21 Q. Anything else?

22 A. Pardon me?

23 Q. Anything else?

24 A. I don't think so.

1           Q.     So, I'm sorry, it was the  
2     9/11 Commission report, the intelligence  
3     documents that you say plaintiffs  
4     produced.

5                     Is that what you're saying?

6           A.     And one diplomatic cable  
7     to -- of instruction to a post in the  
8     Gulf. Yeah, there may have been one or  
9     two other things. But that's essentially  
10    it.

11                    Let's just put it this way,  
12    whatever defendants' counsel submitted to  
13    me, I read.

14          Q.     Did you review your report?

15          A.     I reread it last night.

16          Q.     All right. And when you  
17    just gave me that list, the 9/11  
18    Commission report, the intelligence  
19    documents that the plaintiffs produced  
20    and the diplomatic cable to the post in  
21    the Gulf, are those documents that you  
22    are saying that you read to prepare for  
23    your deposition, or are you saying those  
24    are documents that you read generally?

1           Q.     And the methodology you used  
2 here to render your expert report was  
3 based primarily on your personal  
4 experience and knowledge having been an  
5 Ambassador in the Kingdom?

6           A.     My professional experience  
7 dealing with this and related issues,  
8 both in Saudi Arabia and in prior  
9 incarnations, one of which I mentioned.

10          Q.     And to the extent that you  
11 relied on any documents for your opinion,  
12 they are listed in your report, I take  
13 it; is that fair?

14          A.     I did not rely on documents.

15          Q.     Okay. We talked about the  
16 time when you were an Ambassador and some  
17 issues came up with regard to the Muslim  
18 World League, a Saudi charity.

19                   And I think you met with Mr.  
20 Naseef in Jeddah to discuss with him some  
21 issues regarding the diversion of funds  
22 to support a terror group that came out  
23 of a mosque in Birmingham, something to  
24 that effect.

1 concluded at 8:42 p.m.)

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CERTIFICATE

I, Amanda Maslynsky-Miller, Certified Realtime Reporter, do hereby certify that prior to the commencement of the examination, CHAS W. FREEMAN, JR., was remotely sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.

---

Amanda Miller  
Certified Realtime Reporter  
Dated: April 18, 2021

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)

1 INSTRUCTIONS TO WITNESS

2  
3 Please read your deposition  
4 over carefully and make any necessary  
5 corrections. You should state the reason  
6 in the appropriate space on the errata  
7 sheet for any corrections that are made.

8 After doing so, please sign  
9 the errata sheet and date it.

10 You are signing same subject  
11 to the changes you have noted on the  
12 errata sheet, which will be attached to  
13 your deposition.

14 It is imperative that you  
15 return the original errata sheet to the  
16 deposing attorney within sixty (60) days  
17 of receipt of the deposition transcript  
18 by you. If you fail to do so, the  
19 deposition transcript may be deemed to be  
20 accurate and may be used in court.



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ACKNOWLEDGMENT OF DEPONENT

I, \_\_\_\_\_, do  
hereby certify that I have read the  
foregoing pages, 1 - 511, and that the  
same is a correct transcription of the  
answers given by me to the questions  
therein propounded, except for the  
corrections or changes in form or  
substance, if any, noted in the attached  
Errata Sheet.

\_\_\_\_\_  
CHAS W. FREEMAN, JR.

DATE

Subscribed and sworn  
to before me this  
\_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

My commission expires:\_\_\_\_\_

\_\_\_\_\_  
Notary Public

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